GIA Environmental Health and Safety Compliance Self-Audit Program Standard

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ABSTRACT: The purpose of this GIA standard is to define the basic elements and responsibilities of a site EH & S Compliance Self-Audit Program.

APPLICABILITY: This standard shall apply to GIA facilities and operations worldwide, except where superseded by more stringent country and/or local regulations.

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1 INTRODUCTION

The purpose of this GIA (General International Area) standard is to define the basic elements and responsibilities of a site Environmental Health and Safety (EH&S) Compliance Self-Audit Program.

1.1 SCOPE

This GIA standard shall apply to GIA facilities and operations worldwide, unless superseded by more stringent country and/or local regulations.

1.2 POLICY

Each GIA facility shall institute a comprehensive EH&S compliance self-audit program to measure the success of the site implementation of appropriate and effective EH&S programs.

1.3 RESPONSIBILITIES

This section describes the responsibilities of the persons involved in fulfilling the requirements of this document.

- *Site Manager*

  Ensure that site personnel develop, implement, and adhere to a regularly scheduled EH&S compliance self-audit program.

  Provide adequate support and resources to ensure that self-audits are conducted.

- *Site Environmental Health and Safety (EH&S)*

  Administer the self-audit. Work with site personnel to complete the questionnaire.

  Maintain records of the audit results, document corrective action, and report results and follow-up actions to the GIA EH&S organization.

- *Department Manager/Supervisor*

  Know the EH&S regulations that apply to their respective operations.

  Ensure those regulations are implemented properly and that employees receive appropriate education and training in order to understand and comply with EH&S regulations.

  Ensure that their employees support the EH&S compliance self-audit program.

- *Employees and Contract Employees*

  Attend required training in the application of EH&S regulations to their work.

  Participate in the EH&S compliance self-audit as it applies to their operations.

- *Area EH&S*

  Report significant issues, risks, and follow up corrective actions on identified deficiencies to the Worldwide EH&S Assurance Manager on an annual basis.

- *Corporate EH&S Assurance Manager*

  Ensure a worldwide policy exists for implementing site EH&S compliance self-audit programs.

1.4 LANGUAGE REQUIREMENT FOR THIS STANDARD

The details of this GIA standard and all documentation associated with it, such as manuals, training materials, signs, labels, postings, and so forth, must be available in English and the accepted official local languages.

2 PROGRAM REQUIREMENTS AND INSTRUCTIONS

The EH&S Compliance Self-Audit is comprised of 15 sections. In preparation for the audit, the site manager, site EH&S management, site department managers and supervisors, and GIA EH&S will determine by mutual agreement which sections are applicable to the site and therefore must be audited. Site EH&S Management will prepare the site for the audit and will conduct the audit using the applicable sections of the audit document.

When completing the self-audit, attach additional sheets of paper to the audit document if the answers to questions require more space than has been allotted in the text of this document.

The results of the site EH&S compliance self audit, including a corrective action plan, shall be submitted to the GIA EH&S organization within 3 weeks of the completion of the audit. At a minimum, the audit process shall be repeated annually. However, the review process should be ongoing to assure the implementation and maintenance of necessary EH&S programs.

NOTE

The EH&S Compliance Self-Audit shall be used in conjunction with current GIA EH&S policies and standards.

3 ENVIRONMENTAL, HEALTH AND SAFETY COMPLIANCE SELF-AUDIT

The following 15 subheads comprise the self-audit.

3.1 EH&S POLICY

A. Corporate EH&S Policy

1. Where are copies of the Digital corporate EH&S policy kept on site? Is a copy readily available?

Where are copies of the GIA EH&S Policy Manual kept on site? Is a copy readily available?

2. When did site management review the corporate EH&S policy to determine the action required to ensure compliance?

When did site management review the GIA EH&S Policy Manual to determine the action required to ensure compliance?

3. How has the site management ensured that the obligations specified in the corporate EH&S policy are fulfilled?

4. What additional action has the site management taken to make the corporate EH&S policy available to site employees?

B. Site EH&S Policy Development

1. Identify the site document containing the EH&S policy.

2. Who was responsible for writing this policy?

3. Who reviewed the policy prior to completion?

4. Has the site manager reviewed, signed, and dated the site EH&S policy?

5. How often is the EH&S policy reviewed and reissued?

6. Which sections of the site EH&S policy state the following?

   a. The site management is committed to compliance with government and corporate requirements and to managing unacceptable risks to health, safety, or the environment?

b. Site management is responsible for implementation of the policy requirements?

c. The EH&S resource who assists line management complies with the policy?

d. The programs to be followed ensure compliance with the policy (for example: Occupational Safety, Emergency Preparedness, Environmental Management)?

e. EH&S goals and objectives are to be included in the long range plan and budgeted accordingly?

f. Compliance with the policy is a measurement criteria in employee performance reviews?

C. Site EH&S Policy Implementation

1. Describe the site programs that ensure the EH&S policy is fully and effectively implemented throughout the site.

2. What is the site program for communicating the EH&S policy to employees, customers, contractors, and the general public? For example:

   a. Where are copies of the EH&S policy posted for employees to see?

   b. How are copies of the EH&S policy issued to all employees?

   c. Describe the employee EH&S orientation.

   d. Describe the contractor EH&S orientation.

3.2 EH&S ORGANIZATION, RESPONSIBILITIES, ACCOUNTABILITIES

A. Overall EH&S Organization

1. If there is an EH&S Department, how many people are in the department?

2. If there is no EH&S department, who is the site EH&S coordinator?

3. To whom does the EH&S coordinator or department manager report?

B. Responsibilities and Accountabilities

1. In which written job descriptions are EH&S responsibilities and accountabilities included?

2. How does the site management ensure that its most senior manager is fully responsible for ensuring overall compliance with government and internal EH&S requirements?

3. How do senior staff managers ensure compliance with EH&S requirements in their department or organization?

4. How do cost center managers ensure compliance with EH&S requirements within their cost center?

5. How do Supervisors ensure compliance with EH&S requirements within their direct reporting groups?

6. Who is responsible for the following:
   a. Allocation of finance and time to EH&S?

   b. Development of site EH&S policies and procedures?

   c. EH&S assessments, reviews, and follow-up action?

   d. Monitoring overall EH&S performance?

   e. EH&S training and increasing employee awareness?

7. Who at the site is responsible for development, implementation, and administration of programs for each of the following:

   a. Process and equipment safety?

   b. Administrative control (work permits, hot work permits, confined space, and so forth)?

   c. Personal protective equipment?

   d. First aid or Health Services?

   e. Injury, illness, accident, and incident reporting and investigation?

   f. Contractor safety?

   g. Industrial hygiene (for example: employee exposure assessments, monitoring, control, and so forth)?

   h. Fire prevention and protection?

   i. Emergency preparedness and response plans?

   j. Air pollution control?

   k. Community right-to-know

   l. Water pollution control?

   m. Hazardous waste management?

   n. Nonhazardous waste management?

   o. Management of polychlorinated biphenyls?

   p. Spill prevention control?

q. Risk reduction and control?

r. Waste minimization?

s. CFC reduction and control?

C. Awareness of EH&S Standards and Requirements

1. Briefly describe the system for ensuring that site EH&S personnel are aware of and understand applicable government regulations.

2. Briefly describe the system for ensuring that site EH&S personnel are aware of and understand internal requirements.

3. How are copies of applicable EH&S laws and regulations obtained and maintained on a current basis? Who is responsible for this?

D. Communication of EH&S Issues

1. Does site management meet regularly to discuss EH&S issues? Give details.

2. How does the site safety committee ensure and increase employee involvement and motivation?

a. Who are the members of the Committee?

b. How often do they meet?

c. What is the agenda?

d. Where are minutes of the meetings filed?

e. What evidence exists that corrective action is taken on issues raised?

E. If there is an executive safety committee, who are the members?

a. How often do they meet?

b. What is the agenda?

c. Where are meeting minutes filed?

d. What evidence exists that corrective action is taken on issues raised?

F. What system do employees use to report EH&S problems and concerns?

a. Once identified, who investigates these problems and concerns?

G. What other efforts have been made to ensure effective communication of EH&S issues throughout all levels of the organization?

H. Briefly describe the system for ensuring that Area and Corporate EH&S Digital management are informed of environmental, health, and safety problems?

I. How often do site EH&S staff communicate with the Area and Corporate EH&S groups?

a. Who makes and receives such communication?

b. What are the communication problems, if any?

3.3 EH&S MANAGEMENT—TRAINING

A. EH&S Training Policy and Review Procedures

1. Identify the site document containing the EH&S training policy that covers all employees, including contract personnel.

2. Who is the site EH&S training coordinator? Is this a full time position?

3. How is the site's EH&S training program monitored to ensure that policy objectives are being met?

4. Briefly describe the system for reviewing site procedures and operations in order to identify EH&S training needs.

5. How is additional EH&S training organized prior to the introduction of new processes or equipment?

B. Induction (Orientation) Training

1. How and when does the site ensure that ALL employees have completed an induction training module when they are first hired?

2. Provide evidence that the induction training module covers the following:
   a. Good health and safety practices
   b. Digital's EH&S policy
   c. Local site EH&S policy
   d. Personal protective equipment
   e. Fire evacuation procedures
   f. Chemical spill and incident procedures
   g. Absence and illness reporting

h. Accident reporting

i. Near miss reporting

j. Hazardous waste management

k. Waste minimization

l. Material Safety Data Sheets

m. Emergency Response Team responsibilities

n. Security procedures

o. Employee right-to-know

p. Others

C. General EH&S Training for All Employees

1. Provide evidence that the following EH&S training modules are in place for all employees:

a. Corporate and Site EH&S Policy and Responsibilities and Accountabilities for EH&S (to extend the brief overview given during induction training).

b. General risks related to hazardous materials and operations on site.

c. Use and availability of personal protective equipment.

d. Fire prevention control.

e. Emergency evacuation procedures.

f. Chemical evacuation procedures.

g. Employee right-to-know.

D. Training for Managers and Supervisors

1. Provide evidence that ALL managers and supervisors have attended training in Environmental, Health, and Safety Management.

2. How do managers responsible for environmental affairs receive additional training in Environmental Management (for example: water and air pollution control; waste minimization, storage and disposal; spill prevention and control; CFC and PCB elimination; Hazardous Waste Management)?

3. How do managers and supervisors receive training in Industrial Hygiene (including details of legal requirements, identifying potential occupational exposures to hazardous materials, conducting exposure assessments, methods for monitoring employees, and so forth)?

4. How are supervisors who are authorized to bring contractors on site trained in Contractor Safety and Permit to Work issues?

5. How do supervisors who are authorized to hire temporary employees receive Temporary Employee EH&S training?

6. How do managers and supervisors responsible for EH&S affairs receive EH&S Audit training?

7. Which managers and supervisors responsible for EH&S affairs have received media training within the past 12 months?

8. What additional EH&S training do managers and supervisors receive, if any?

E. Training for EH&S Coordinator(s)

1. What in-depth training related to relevant environmental, health, and safety issues has the EH&S coordinator received?

2. What local regulatory training have the EH&S coordinator and EH&S staff received in permitting, EH&S compliance, legal affairs, and so forth?

F. Training for Maintenance, Production, Engineering, and other Service Groups

1. How are maintenance, production, engineering, and other service staff trained in:

a. Safe practices?

b. Use of personal protective equipment?

c. Good housekeeping?

d. Permit-to-work system?

e. Hot work permit?

f. Electrical safety?

g. Materials handling?

h. Fork lift safety?

i. Hazardous materials safety?

j. Hazardous materials transportation?

k. Lock and tag?

l. Chemical spill, prevention, and control?

m. Use of fire extinguishing equipment?

n. Bulk chemical delivery?

o. Emergency response procedures?

p. Hazardous waste management?

q. Laser safety?

r. Confined space entry?

s. Radiation safety?

G. Training for Emergency Preparedness and Response Teams, Safety Committee, and First Responders

1. Describe any additional relevant training provided to the Emergency Response, Crisis Management, and Business Recovery teams that has not been covered under the Emergency Preparedness section of this audit.

2. How have members of the Site Safety Committee(s) been trained in EH&S issues?

3. How have all persons responsible for first aid received appropriate EH&S training?

H. EH&S Training Record Keeping

1. Where are records of EH&S training maintained?

2. Is there a separate record for each employee?

3. Do the records clearly indicate the following:

a. What training each employee has received?

b. When the training was provided?

c. Department and position of employee?

d. Whether employee has changed jobs or assumed additional responsibilities?

e. What training is still needed?

4. How often are training records reviewed to identify training or retraining needs? Who is responsible for reviewing the records?

---

5. Provide evidence that EH&S training records, where required by law, are retained in employee personnel files.

3.4 GENERAL INFORMATION

A. General

1. Provide evidence that copies of applicable regulations are readily available.

2. How and where are records of permits maintained?

3. What system exists to assure that permits are renewed prior to expiration?

4. List the reports that must be sent to regulatory agencies.

5. What evidence exists that all required regulatory reports have been submitted to the proper agency on time?

6. What planning does the site do regarding permit applications and submittals prior to capital approval or process changes?

7. What evidence exists that all environmental process changes have been reviewed by GIA area management?

8. Discuss any major excursions to permit limitations since the last audit.

9. Show that all reportable permit excursions have been reported to the appropriate regulatory agency, GIA area management, and the Law department.

10. How have employees been trained to perform jobs that are required by an environmental regulation?

3.5 EMERGENCY PREPAREDNESS

A. Risk Assessment

1. When and by whom was a full site risk assessment conducted (including risks of fire, explosion, major accidents, chemical spillage, and so forth)?

2. What action has been taken to reduce or to investigate the possible reduction of risks on site?

3. To which site manager(s) have the findings of the risk assessment been communicated?

4. How were findings of the risk assessment communicated to local emergency services?

5. How does the site management ensure that a risk assessment is conducted before significant site construction or process modifications are initiated?

B. Fire Prevention Planning

1. Identify the site document that contains the site-developed list of major workplace fire hazards.

What is done to ensure:

a. Proper material handling and storage procedures?

b. Identification of potential ignition sources and control procedures?

c. The availability of the proper type of fire protection equipment or systems?

2. List the location of the following items, who has determined their adequacy, and who maintains them.

a. Automatic sprinkler system?

b. Fire hydrants?

c. Portable fire extinguishers?

d. Hose reels?

e. Fire blankets?

f. Fire alarms?

3. What details exist to show that the site's fire prevention program includes:
   a. Housekeeping procedures to minimize fire risk and ease evacuation?

   b. Maintenance programs for equipment and systems installed on heat producing equipment to prevent accidental ignition of combustible materials?

   c. Fire protection equipment impairment procedures that take into account regularly scheduled maintenance, repairs, and accidental incidents?

   d. Designated *Smoking* and *No Smoking* areas?

   e. Semi-annual inspections to identify potential fire hazards in the sites' operations and to review performance of existing extinguishing equipment and alarm systems?

   f. Review of capital projects including consultation with the fire insurance carrier?

   g. An invitation to the fire department to tour the facility in order to become familiar with site operations and fire hazards?

C. Emergency Preparedness Plan
   1. Identify the site document describing an *Emergency Preparedness Plan*.

   2. How does the site management ensure that the emergency preparedness plan is up-to-date (for example: periodic review, review upon process changes or other modifications)?

   3. Which sections of the document define the roles and responsibilities and members of the:
      a. Emergency Response Team?

b. Crisis Management Team?

c. Business Recovery Teams?

4. How are members of these 3 teams trained for their possible future tasks?

5. How are procedures defined and communicated for contacting Emergency Response, Crisis Management, and Business Recovery teams during each shift and during nonbusiness hours?

6. Where is the designated Crisis Management Team command post located? How is it equipped?

7. Where are the following elements of the Site Profile located? Are they immediately available?

   a. Site layout maps?

   b. Building drawings?

   c. Drainage maps?

   d. Inventory of hazardous materials on site?

   e. Overview of operations?

   f. Business overview?

   g. Copy of annual insurance Site Risk Profile?

   h. Air emission possibilities from vents, stacks, tanks, and other containers?

   i. Emergency equipment location map?

j. General site information aspects:

- Site description including number of employees

_____

- Storage tanks and process vessels and location

_____

- Hazardous waste storage and location

_____

- Loading and unloading operations and location

_____

- Piping diagrams with pipes labeled identifying contents and dimension of flow

_____

- Site security (Digital and/or contract)

_____

- Emergency power and lighting

_____

k. Release prevention programs:

- Relief valve inspection and maintenance program

_____

- Preventive maintenance program details

_____

- Corrosion protection safeguards

_____

- Tank integrity, inspection, and leak detection

_____

- Emission and discharge monitoring

_____

- Drum control program

_____

- Personnel training

_____

8. How often is the Site Profile reviewed and updated? By whom?

_____

9. Which document describes specific business reinstatement plans for recovering from major risk scenarios (for example: fire, flood, fatal accident, bomb threat, civil disturbance, and so forth).

10. What evidence exists that the emergency preparedness plan has been implemented, tested, and necessary corrective actions have been taken?

D. Emergency Response Plan

1. Identify where in the site Emergency Response Plan the following are defined:

   a. Emergency escape procedures and emergency escape route assignments?

   b. Procedures to be followed by Emergency Response Team members?

   c. Procedures to account for all employees after emergency evacuation has been completed?

   d. Rescue and medical duties for those employees who will perform them?

   e. Semi-annual evacuation drills?

   f. Procedures for warning neighboring companies and the local community in the event of an emergency?

   g. Names of persons or departments who can be contacted for further information or explanation of duties under the plan?

   h. Names, addresses and home phone numbers of key Emergency Response personnel and plant staff?

   i. Site spokesperson with 24 hour contact capability?

   j. Arrangements with local authorities?

2. How does the site management ensure that all employees have reviewed and are familiar with the emergency response plan?

3. How has the Emergency Response Team been trained to respond to the following:
   a. Fire?

   _____

   b. Flood or water damage salvage?

   _____

   c. Chemical spill?

   _____

   d. Toxic gas release?

   _____

   e. Major accident (medical emergency)?

   _____

   f. Bulk chemical delivery incident?

   _____

   g. Adverse weather?

   _____

   h. Bomb threat?

   _____

   i. Hazardous materials incident?

   _____

   j. Other?

   _____

4. When does the Emergency Response Team receive refresher training courses for the above?

   _____

E. Forms

1. In what section of the site Emergency Response Plan are the following forms and tables referenced or located:
   a. Storage tank inspection form?

   _____

   b. Drum area inspection form?

   _____

   c. Environmental incident report form?

   _____

d. Training program schedule for emergency response teams and site management?

e. Environmental and emergency agency contact form?

f. Hazardous chemicals inventory form?

g. Environmental inspection form?

h. Facility layout and area map?

i. Job titles, phone numbers and addresses of emergency personnel?

j. Release response equipment list?

k. Emergency equipment list and location?

l. Personal protective equipment list and location?

m. Emergency notification list?

n. Medical emergency information?

o. Outside emergency information?

p. Local contacts for emergency spill clean-up materials and equipment?

q. Material Safety Data Sheets?

r. Chemical compatibility chart?

s. Waste analysis plan?

t. Release decision tree?

u. Release decision scenarios?

v. On-site contractor list?

w. Equipment shut-off and turn-on list for emergency power, exhaust systems, other utilities, and so forth

F. Emergency Alarm System

1. What is the system for ensuring that the emergency alarm system is functioning?

2. What is the frequency of the emergency alarm system test?

3. How are individuals trained who maintain and service the emergency alarm system?

G. Means of Egress

1. How does the site ensure that at ALL times:

a. Exits are clearly visible; every path of escape is arranged and marked so that the way to safety is unmistakable?

b. Exit ways are illuminated; back up systems are available in the event of power failure?

c. Exits are marked by a readily visible illuminated sign reading EXIT with an arrow indicating the direction of exit?

d. Access to exit is marked by a readily visible sign?

e. Alternative exits exist if one is mechanically damaged and will not open?

f. The use of any fastening device on exit doors is prohibited that would prevent free escape from the inside of a building?

g. Exit, approaches to the exit, and areas outside the exit are maintained clear of all obstructions, including work in progress?

h. Doors leading to the exit are of the free-swinging hinge type that open outward?

i. All exits discharge directly to the street or other open space that gives safe access to a public way or meeting area?

2. What evidence exists that periodic site inspections are conducted to confirm there are sufficient number of fire exits, and that exits are clearly visible and not obstructed?

3. How are on-site contractors made aware of site emergency egress procedures?

4. How are temporary employees trained in means of egress?

5. What is the required width of exit aisles? How does the site management ensure compliance?

6. How does the site management ensure exit aisles are well marked?

7. How frequently is emergency lighting tested?

8. How are employee assembly locations identified?

9. Who has been assigned the duty of accounting for employees, contract and temporary personnel in an emergency?

3.6 ILLNESS/ACCIDENT/INCIDENT REPORTING AND INVESTIGATION

Three phases exist for this section of the self-audit.

A. Written Procedures

1. Identify the site procedure for recording, reporting, and investigating illness, accidents, and incidents.

_____

2. Which sections of the document describe the following? List who is responsible for each.

   - What is to be recorded and when?

     _____

   - What is to be reported and to whom?

     _____

   - What is to be investigated and what are the procedures?

     _____

   - How will the investigation results and details of the corrective action process be used?

     _____

3. Identify the site procedure, as required, for reporting incidents to regulatory agencies and Digital management.

_____

4. Does the procedure clearly define which accidents, injuries, and illnesses must be reported to the relevant enforcing authorities and to Digital management? What are they?

_____

5. What is the system for ensuring that all employees are familiar with the procedures?

_____

B. Reporting and Investigation Process

1. What evidence exists to assure that all work-related injuries and illness are reported to Health Services, recorded, and investigated?

_____

2. What evidence exists that accident investigation forms are completed for all accidents?

_____

3. Who conducts accident investigations? Are EH&S and the area supervisor involved?

_____

4. How are near-miss accidents recorded and investigated?

5. What is the system for reporting and recording employee absence due to illness?

6. How are investigations documented and reported to appropriate management?

7. Where are records kept of accidents, injuries, and illnesses reportable to government authorities?

8. Briefly discuss any reportable accidents, injuries, or illnesses within the past year.

9. Where are records kept of total instances of lost work days due to injuries and occupational illness?

10. How are illness, accident, and incident data analyzed to identify trends?

11. How are employee absence reports analyzed to identify occupational-related trends not otherwise apparent?

12. Where are accident records located and how are they sorted?
    - Job Title?
    - Type of injury (for example: abrasion, strain, laceration)?
    - Location on the body?
    - Department or area where the injury occurred?

13. How frequently is summary data for accidents and illnesses distributed and explained to site management and the Safety Committee?

14. What is the frequency of and system for distributing and explaining summary data of accidents and illnesses to all employees?

15. What evidence exists that all the following types of incidents are recorded:
    a. Fires

b. Chemical spills

c. Property damage

d. Company vehicle or car damage

e. Civil disturbance

C. Corrective Action Process

1. What corrective actions are required following the investigation of accidents, incident, and occupational-related illnesses?

2. Describe the site program to reduce injuries, illnesses, and incidents (include goals and activities planned to achieve these goals).

3. How does the site Safety Committee use accident, injury, and incident reports to eliminate hazards in the work place?

3.7 OCCUPATIONAL SAFETY MANAGEMENT

A. General Workplace Safety

1. Identify the site procedures in place to ensure the following:

   a. Stairways and walkways are marked and clear of obstructions.

   _____

   b. There is sufficient lighting in all work areas.

   _____

   c. All open pits, tanks, vats, and sumps are covered by guardrails or covers to protect employees.

   _____

   d. All floor holes are guarded, preferably with a guardrail and toe board.

   _____

   e. All wall openings and open-sided floors where there is a drop of four feet are guarded with rail roller or equivalent barrier.

   _____

   f. Portable wooden ladders are maintained in good condition, and a routine inspection program is in place.

   _____

   g. Safe work on scaffolding (for example: footing is sound, rigid, and capable of carrying the maximum intended load; an access ladder is provided; material being hoisted has a tag line).

   _____

B. Equipment Management

1. Describe how equipment on site is examined to identify safety needs.

   _____

2. What is the site procedure for examining new equipment prior to use in order to identify safety needs?

   _____

3. Describe the site's formal equipment inspection and preventive maintenance program?

   _____

4. How is inspection and maintenance work documented?

   _____

5. Identify the mechanical safety procedures that exist for the following equipment:

   a. Abrasive wheels

   _____

b. Air receivers

c. Hoists and lifts

d. Power presses

e. Robotics

f. Woodworking machinery

g. Band and circular saws

h. Other hazardous machinery. Specify.

6. Provide evidence that machine guarding has been installed on all power presses, band and circular saws, conveyors, and other moving machinery.

7. How often are machine guards inspected?

8. Where are welding, cutting, or brazing operations performed on site?

9. What procedures exist to ensure that:
   a. Acetylene cylinders are stored valve-end up?

   b. Personnel performing arc welding and resistance welding have been trained and are qualified or certified?

   c. Voltage limits specific to the country are not exceeded?

   d. Welding machine frame is grounded?

   e. Flash welding machines are equipped with a hood to control flying flash?

   f. Fire resistant curtains and shields are set up around the machine?

g. Fire extinguishing equipment is maintained in a state of readiness for instant use?

h. Adequate ventilation is provided during welding and cutting (for example: local exhaust hoods and booths)?

10. Identify the site procedures that exist for the following (if applicable):
    a. General electrical safety
    b. High voltage work
    c. Portable electrical equipment
    d. Emergency generators
    e. Use of hand tools

C. Powered Industrial Vehicles
1. Which fork-lift trucks does the site employ for material handling?
2. How often are fork-lift trucks inspected?
3. What is the program for training and licensing employees who operate fork-lift trucks?
4. How long are licenses valid?
5. What medical examinations and refresher training are fork-lift operators subject to before relicensing?
6. List all safety equipment (for example: horns, lights, fire extinguishers, motion warning devices, and overhead protection devices) that site vehicles are equipped with.
7. Identify the site document that describes the inspection and maintenance program for all in-plant vehicles, including frequency of inspections.

8. Identify the site document that describes the inspection and maintenance program for hoisting and lifting equipment, including the frequency of inspections.

_____

9. Identify the manual handling procedures that exist, including, for example, procedures to reduce the risk of back injury.

_____

D. Administrative Control Program

1. Identify the site document that identifies high risk operations requiring special administrative controls.

_____

2. Identify the site documents that contain procedures for each of the following high risk activities.

   a. Confined space entry

   _____

   b. Electrical and mechanical lockout and tag

   _____

   c. Electrical hot work permit

   _____

   d. Welding and cutting

   _____

   e. Line breaking

   _____

   f. Working alone

   _____

   g. Working with specialty gases

   _____

   h. Other high risk activities. Specify.

   _____

3. Describe the permit-to-work system in place for all high risk activities.

_____

E. Contractor Safety

1. How does the site ensure that all contractors are made aware of general site safety practices and their obligations?

_____

2. What is the program to monitor contractor conformance with site safety practices?

3. What orientation is given to contractors, especially before performing jobs in high risk or hazardous areas?

3.8 INDUSTRIAL HYGIENE MANAGEMENT

A. Hazardous Materials in the Workplace

1. Identify the site document that contains the inventory the types, locations, and volumes of hazardous materials on site.

2. Which employees handle chemicals?

3. List the potential work exposures to chemical agents on site.

4. If a survey of the site has been conducted to identify asbestos, give details of any asbestos that was located.

B. Hazardous Physical Agents in the Workplace

1. Identify the site document containing the inventory of hazardous physical agents in the workplace (for example: noise, low-frequency radiation, ionizing radiation sources, heat, lasers).

2. Provide details on the potential work exposures to hazardous physical agents.

C. Assessment of Health Risks

1. When was a site assessment done of the health risks created by exposure to hazardous materials and physical agents in the workplace?

2. Give details on any measurements made of the levels of chemical and physical agents in the workplace.

D. Employee Monitoring

1. What are the governmental regulations, if any, that require regular monitoring of employees' exposure to hazardous materials or physical agents?

2. Describe the monitoring program for all employees potentially exposed to hazardous materials or physical agents. State the frequency of monitoring.

As a guideline, employee monitoring should be undertaken in the following cases.

a. When failure or deterioration of control measures could result in a serious health effect.

b. When measurement is necessary to ensure that an exposure standard is not exceeded.

c. As an additional check, if needed, on the effectiveness of any control measure.

3. What records are maintained of monitoring that has been conducted?

4. How are employees informed of monitoring results?

5. How is Health Services informed of employee monitoring results?

E. Engineering Control Systems

1. What engineering control systems (for example: local exhaust ventilation, hoods, air pollution control devices) are used to control hazardous materials or physical agents?

2. How often are engineering controls thoroughly examined and tested?

3. Identify the site documentation that describes inspection and maintenance of the engineering control systems?

4. What administrative controls are used for hazard control (for example: limiting exposure time)?

5. What areas, if any, are designated as limited access or regulated areas?

6. What procedures are in place to ensure that control systems are properly used or applied?

F. Personal Protective Equipment (PPE)

1. Identify the site procedure that defines the formal process for reviewing, approving, and inspecting PPE. State frequency of inspections.

2. When were site operations and equipment last reviewed to identify PPE needs and government regulations?

3. List which, if any, of the following PPE are in use.

a. Hard hats

b. Safety glasses

c. Safety shoes or boots

d. Chemical goggles

e. Face shields

f. Welding glasses or shields

g. Respirators

h. Self-contained breathing apparatus

i. Protective clothing

j. Gloves

k. Aprons

l. Radiation badges

m. Laser eye protection

n. Barrier creams

4. To which of the following is PPE issued?
   a. All employees

   b. Selected employees

   c. Upon request

   d. Contractor employees

5. How have users been instructed in the proper usage of PPE?

6. What is the system for obtaining replacement PPE quickly and easily?

7. Which areas are posted with hazard warning signs indicating that PPE must be worn?

G. Hearing Protection Programs

1. When and by whom was a survey conducted of noise in the workplace?

2. Which on-site areas exceed a noise level of 85 dB(A)?

3. Provide evidence that work areas where noise levels exceed regulated levels (normally 90 dB(A)) are posted with appropriate high noise warnings.

4. How have employees working in high noise areas been informed of their exposure?

5. What noise abatement engineering controls are in use?

6. How are engineering controls tested for their effectiveness in reducing noise exposure?

7. What administrative controls are in use (for example, limiting exposure time)?

8. How are employees who are likely to be exposed to 85 dB(A) or above provided with a choice of ear protectors?

9. How are employees instructed in the proper use of ear protectors?

10. What records show that employees provided with ear protectors receive annual audiometric exams?

11. Show that employees provided with ear protectors are given a personal fit test.

12. Under what circumstances are personal noise dosimeter tests conducted?

H. Employee right-to-know

1. Identify the site document that defines the system for reviewing and maintaining Material Safety Data Sheets (MSDS).

_____

2. Where are MSDSs filed on site?

_____

3. How often is the MSDS file updated to include new MSDSs and remove those of chemicals no longer in use?

_____

4. How are MSDSs made easily accessible to employees?

_____

5. What training do employees receive to read and understand MSDSs? How often is refresher training conducted?

_____

6. Show that MSDS files have been provided to the following.
   a. Fire department

   _____

   b. Local hospital(s)

   _____

   c. Emergency Response Team (internal)

   _____

   d. Local Hazardous Materials Response Team

   _____

   e. Regulatory agencies

   _____

   f. Others

   _____

3.9 HAZARDOUS MATERIALS

A. Prepurchase Review

1. Identify the site Materials Purchase Review Procedure that defines how hazardous materials are reviewed prior to their purchase for their potential effects on health, safety, and the environment.

   _____

   What sections of the document describe:

   a. Who is responsible for conducting the review?

      _____

   b. Review of the chemical and physical nature of material?

      _____

   c. Review of who will be utilizing or handling the materials and what the material will be used for?

      _____

   d. Review of the quantity to be purchased and the quantity stored on site?

      _____

   e. Material Safety Data Sheet (MSDS) review?

      _____

   f. Storage requirements review?

      _____

   g. Determination of health and safety needs (for example: protective equipment, local exhaust ventilation) when using the material?

      _____

   h. Review of environmental impact of material?

      _____

   i. Determination of packaging or container type and the related disposal requirements?

      _____

   j. Review of alternative materials?

      _____

   k. Determination of waste minimization capabilities (for example: recycle, recover, re-use)?

      _____

B. Materials Handling

1. Which employees handle hazardous materials?

2. Where are Material Safety Data Sheets (MSDS) filed for all hazardous materials handled on site?

3. What is the site document that describes the process for receiving packaged hazardous materials?

Which sections of the procedure define:

a. Specified area on site for receiving packaged hazardous materials?

b. Confirmation of correct packaging and labeling, in accordance with applicable regulations?

c. MSDS review and availability of MSDSs?

d. Safe handling procedures?

e. Use and availability of chemical resistant personal protective equipment (goggles, gloves, aprons)?

f. Clear procedures to follow if packaged materials are damaged?

g. Use and availability of fire suppression equipment?

h. Use and availability of spill control materials and equipment?

4. Which site document describes the procedure for receiving bulk hazardous materials?

Which sections of the procedure define:

a. Restricted area access during loading and off-loading?

b. MSDS review and availability of MSDSs?

c. Supervision requirements?

d. Protection of drains?

e. Hose connection procedures?

f. Use and availability of chemical resistant personal protective equipment?

g. Use and availability of fire suppression equipment?

h. Use and availability of spill control materials and equipment?

i. Procedures to follow in case of spillage?

j. Procedures to warn the community in case of major spill or release?

k. Conducting periodic hands-on drills?

l. The preventive maintenance program?

C. Materials Storage

1. Where are hazardous chemicals stored on site?

2. Provide an inventory of the location, volume, and type of chemicals stored.

3. Describe secondary containment of storage tanks and drum storage areas.

4. How does the storage system ensure that noncompatible materials are segregated?

5. How does the storage system ensure that full and empty containers are segregated?

6. How are closed vessels that contain or store highly flammable liquids marked?

7. How are storage tanks, rooms, and buildings marked to indicate the types of hazardous chemicals stored inside?

8. Where are the following items located in relation to hazardous chemical storage areas:
   a. Safety showers

   b. Eye wash stations

   c. Fire suppression equipment

   d. Spill control materials

   e. Self contained breathing apparatus

   f. Alarms

   g. Communication equipment

   h. Material Safety Data Sheets

   i. Emergency first aid equipment

9. Where are clear *No Smoking* notices displayed in relation to hazardous chemical storage?

10. What other required signs are visibly posted (for example: authorized personnel only, chemical storage, compressed gases, and so forth)

11. Describe the system used to ventilate storage buildings (natural draft or mechanical, and so forth).

12. How has the site ensured that explosion-proof electrical fixtures, motors, and switches are used in hazardous materials storage and flammable storage areas?

13. State the frequency and provide documentation of the following inspections.
   a. Above and below ground storage tanks

   b. Piping

c. Drum storage

d. Storage buildings and cabinets

e. Tank farm

f. Compressed gas storage

g. Secondary containment structures

14. State the frequency and provide documentation of inspection of the following items in hazardous chemical storage areas:
    a. Fire and chemical alarm systems

    b. Personal protective equipment cabinets

    c. Self-contained breathing apparatus

    d. Safety showers and eye wash stations

    e. Storm drains or outfalls

    f. Spill control materials and equipment

15. If applicable, what is the system for ensuring the following:
    a. All compressed gas cylinders are stored standing upright and secured.

    b. Cylinder storage area has *No Smoking* signs posted.

    c. Cylinders are grouped by types of gas.

    d. Full and empty containers are stored separately.

    e. Cylinders are not stored near readily ignitable substances.

f. Cylinders are protected from external corrosion (for example: away from corrosive chemicals, fumes, salts, and so forth).

---

g. Outside storage of cylinders has protection from the ground beneath to prevent bottom corrosion.

---

h. Valve covers are kept on all cylinders except when in use.

---

i. Only authorized, trained personnel have access to cylinders.

---

j. Only cylinder holders are used for moving cylinders.

3.10 HAZARDOUS WASTE MANAGEMENT

A. Solid and Hazardous Waste Management

1. Provide an inventory of solid and hazardous wastes generated on site.

2. How and when was the nature of the content of generated wastes characterized?

3. How are wastes analyzed to determine which wastes are nonhazardous?

4. What wastes do site personnel produce that are classified as:
   a. Hazardous wastes?
   b. Other?

5. What records are kept of the types and quantities of hazardous and nonhazardous wastes generated?

6. Describe the site waste minimization program.

7. What procedures exist to prevent the mixing of hazardous and nonhazardous waste?

8. What hazardous wastes are stored on site? State length of time wastes are generally stored.

9. Where are secondary hazardous waste storage areas, if any, located?

10. If the site is required to have a generator or permit number for hazardous waste activity, list it.

11. What are the regulatory requirements, if any, for approval of hazardous wastes prior to disposal?

12. What special labeling is required for containers of hazardous waste?

13. How are containers of hazardous wastes labeled and dated?

14. How often are waste containers inspected for leakage and corrosion?

15. How does the storage area for hazardous waste provide secondary containment?

16. How does the site management provide specialized training in hazardous waste management? How often and to whom is training provided?

17. Provide job descriptions for employees handling hazardous wastes.

18. What site document describes the site's hazardous waste contingency plan? How often is the document updated?

19. Does the contingency plan include a current Spill Prevention, Control, and Countermeasure plan (SPCC) for oil and toxic materials?

20. Who is the designated emergency coordinator on-site or on-call at all times?

21. What arrangements have been made with local authorities to familiarize them with characteristics of the site?

22. How has the site management familiarized local hospitals with the properties of hazardous waste handled and the types of injuries that result from fires, explosions, or releases at the site?

23. What ignitable or reactive wastes does the site handle, if any?

24. How are ignitable wastes handled and stored to prevent fires and/or explosions?

25. How has the site management ensured it has adequate safety and communication equipment?

26. What hazardous waste, if any, does the site management store in underground storage tanks?

27. What is the the site program for minimizing the amount and toxicity of its wastes?

28. How often are inspections of hazardous waste storage areas conducted?

Provide evidence that the inspection includes:

a. Monitoring equipment

b. Safety and emergency equipment

c. Security devices

d. Operating and structural equipment

e. Types of problems with equipment, such as malfunctions and operator error

f. Section to note when problems were corrected

29. Provide evidence that inspection records include:

a. The date and time of inspection

b. The name of the inspector

c. A notation of observation

d. The date and nature of repairs or remedial action

30. Provide evidence that the site management maintains a copy of a waste analysis plan that includes:

a. The parameters for which waste will be analyzed

b. The test methods used to test for these parameters

c. The sampling method used to obtain the sample

d. The frequency with which the initial analyses will be reviewed or repeated

31. How does the site management provide adequate security for remote storage areas?

32. How are hazardous wastes manifested? How are records of manifests maintained?

33. What are the site requirements for reporting hazardous waste activity to regulatory agencies? (To which agency and how often?)

34. How often are internal audits conducted to ensure compliance with hazardous waste regulations?

35. During the past 12 months when was the site inspected by a regulatory agency for hazardous waste activity?

36. Has the site received Notice of Violation for noncompliance with hazardous waste management activities?

37. List the location(s) and date of inspection of all off-site hazardous waste disposal facilities that have been inspected and approved by local EH&S and site management?

38. Provide a list of off-site vendors and back up vendors, if applicable.

39. Provide the name and response time of the local emergency hazardous waste clean-up vendor(s) with whom the site management has a contract, if applicable.

40. Provide the date and details of any reportable hazardous waste incidents that have occurred in the past 12 months, if applicable.

41. What wastes does the site recycle, reclaim, or re-use?

3.11 WATER POLLUTION

1. Which of the following, if any, are discharged into a water body?
   a. Noncontact cooling water?

   b. Manufacturing and storage area surface water runoff?

   c. Undeveloped area surface water runoff?

   d. Dredge and fill solids drainage water?

   e. Waste water treatment plant effluent?

   f. Process waste water?

   g. Other?

2. Which of the following, if any, are discharged into a publicly owned waste water treatment plant?
   a. Process waste water?

   b. Domestic (sanitary) waste water?

   c. Waste water treatment plant effluent?

   d. Other?

3. Identify the site document containing a complete inventory of all waste water discharge points and sources.

4. How have the nature and volume of waste water discharges been characterized?

5. Which effluent limitations is the site subject to?

6. Briefly describe any discrepancies in site conformance with applicable requirements that occurred during the past 12 months.

7. Describe reportable effluent excursions that occurred during the past 12 months.

8. If the site conducts any effluent monitoring, who analyzes the monitoring samples?

9. State frequency of calibration and inspections of waste water treatment equipment.

10. Where are maintenance and inspection records for treatment equipment maintained?

11. Have reportable changes occurred in raw materials, effluent volume or process? Which regulatory agencies have been notified?

12. What portion of the site's drinking water supply comes from on-site wells or surface water sources?

13. How often are on-site drinking water sources monitored?

14. List and explain any storm water point source outfalls at this site.

15. If back flow preventors are used on potable water supplies, how are they inspected and maintained?

16. Where on site is the waste water treatment permit filed?

17. What is the site process for timely renewal of the waste water permit?

18. How often are effluent limitation reports sent to regulatory agencies?

19. How many waste water treatment excursions were noted in the last 12 months? What parameters were exceeded?

    a. What steps were taken to prevent recurrence?

    b. How were these excursions reported?

20. Within how many working days are permit excursions reported?

21. If the site is under any permit compliance schedule, explain.

22. When, during the past 12 months, did regulatory inspections of waste water take place at the site?

23. How does the site management ensure that its on-site treatment systems are properly operated, maintained, and fully functional?

24. When is the annual site shutdown for preventive maintenance generally scheduled?

25. Which certified laboratory, if any, is used to analyze waste water effluent?

    a. Are split samples taken?

    b. What analytical methods does the certified lab use?

26. How are waste treatment operators and lab personnel properly trained?

27. How long are analytical records retained on file at the site?

28. If the site has pretreatment standards, what are the parameters in the permit?

29. If the site has received any Notices of Violation, Administrative Orders, or other regulatory citation in the past 12 months, which agency or agencies issued them?

30. Identify the site document, if any, that contains the Spill Prevention, Control, and Countermeasures (SPCC) Plan?

    Is the plan for:

    a. Oil?

    b. Hazardous substances?

    c. Oil and Hazardous substances?

31. Provide evidence that the SPCC oil plan been signed, dated, and stamped by a Registered Professional engineer.

32. To what regulatory agency has the SPCC plan been submitted?

33. What document contains the site environmental incident and notification procedures?

34. Where are copies of the plan and procedures kept on site?

35. Briefly describe the separate contingency plan the site has developed for hazardous substances?

36. How often are the plans and procedures updated and approved?

37. Briefly describe the secondary containment provided for:
    a. Oil storage tanks

    b. Hazardous substances or hazardous waste tanks

    c. Oil and other chemical drum storage areas

38. Briefly describe the spill control materials and equipment that are available?

39. How often are the following inspected?
    a. Above ground storage tanks?

    b. Piping?

    c. Raw material storage areas?

    d. Secondary containment structures?

40. What documentation is kept of the the above inspections?

41. Has the site had a reportable spill within the past 12 months?

42. If a reportable release occurred, provide evidence that the following information is part of the record.

    a. Date

    _____

    b. Substance

    _____

    c. Amount

    _____

    d. Cause

    _____

    e. Corrective action taken

    _____

    f. Plans for preventing recurrence

    _____

43. Where are process flow diagrams filed that show all flow into waste water treatment processes?

    _____

    a. What types of changes would cause the site to update the diagrams?

    _____

44. What is the process to stop or retard discharges into waste-water treatment systems?

    _____

45. If waste water treatment operators are required to be licensed and/or certified, what level is required for this site?

    _____

46. Where is the list maintained of all chemicals and process waters discharged to the waste water treatment plant?

    _____

3.12 HEALTH SERVICES MANAGEMENT

A. Qualified Medical Personnel

1. How many trained first aid providers are on each shift? Is there a doctor, nurse, or emergency medical technician?

2. Who is responsible for dispensing first aid supplies? Is that person a trained first aid provider?

3. If there is a qualified doctor on site:
   a. How many hours a week is the doctor there?
   b. How often does the doctor tour the site?
   c. How often does the doctor meet with EH&S and/or site management?
   d. Does the doctor review all accident cases?
   e. Does the doctor review pre-employment physical examinations?

4. If there a qualified nurse on site:
   a. How many hours a week is the nurse there?
   b. How often does the nurse tour the facility?
   c. How often does the nurse meet with EH&S staff and site management?
   d. What evidence is there that the nurse reviews Material Safety Data Sheets?

5. First Aid Services
   1. Where is the fully equipped first aid room or health services unit located on site?
   2. Provide evidence that first aid and emergency medical response equipment (including stretchers and blankets) is located at the site?

3. Provide evidence that first aid kits are inspected regularly to verify that they are adequately stocked and that the contents have not exceeded useful shelf-life or expiration dates. State frequency of inspection.

4. How does the site management ensure that first aid kits are clearly marked?

5. How have all employees been informed of first aid arrangements?

6. How are records maintained of all first aid cases that have been treated?

7. Which specific chemical emergencies (for example: cyanide, HF, and so forth) is Health Services equipped to handle?

8. What is the system for first aid referrals for unusual contingencies (for example: mobile emergency units, hospital emergency department)?

9. Is a Material Safety Data Sheet file located in Health Services?

6. Medical Surveillance Program
   1. What evidence exists that pre-employment medical evaluations are conducted?
   2. Are annual medical check-ups provided for all employees?
   3. Which employees receive more detailed or specific medical evaluations, for example:
      a. Employees working with government-regulated substances?
      b. Employees working with suspected or known carcinogens?
      c. Employees working with corrosives or acids?
      d. Employees working with other hazardous substances? Give details.
      e. Employees working in high noise areas?
      f. Emergency Response Teams?

g. Fork-lift truck drivers?

h. Commercial vehicle drivers?

i. Employees spending a large proportion of their time working with visual display units (VDUs)?

j. Employees exposed to radiation sources?

k. Employees exposed to low frequency radiation?

4. How are employees notified of the results of their medical examinations?

5. Provide evidence that occupational health records are maintained in confidential restricted access files.

7. Health Promotion Programs
   1. Describe the site Health Promotion Program including provision of information to employees on the following topics:

      a. Nutrition and weight

      b. Stress management

      c. Smoking cessation

      d. Heart disease

      e. Smoking cessation

      f. AIDS

      g. First aid

h. CPR

_____

i. Other? Specify.

_____

2. How is this program communicated to employees?

_____

8. Employee Assistance Program
   1. Describe the program in place to provide assistance to employees who suffer from either disease, addiction, stress, or anxiety.

      _____

   2. How is this program communicated to employees?

      _____

3.13 AIR POLLUTION

A. Air Pollution Control

1. Identify the site document that contains a complete inventory of air emission points (locations where air emissions enter the atmosphere) and sources (where emissions come from).

2. How and when did the site management characterize the nature and volume of emitted pollutants?

3. What have been the changes in emission levels since the last emissions inventory?

4. Which hazardous or toxic air pollutants, if any, are present in the air emissions (for example: beryllium, asbestos, VOCs?)

5. How do government authorities regulate air emissions, if at all?

6. What permits or registration applications is the site required to submit for air emission sources, or new or modified processes with emission points?

   What is the system for timely renewal of air permits and associated fees?

7. What air emission control equipment has been installed at the site?

8. Describe any periodic or continuous air monitoring that the site conducts.

9. What evidence exists that the site has complied with all air emission standards during the past 12 months?

10. How are employees who are responsible for operating or maintaining air pollution control equipment trained? How do they know to whom to report problems?

11. What is the preventive maintenance schedule of air pollution control equipment? What documentation exists for inspections and maintenance?

12. List existing air pollution permits and those required to be renewed during the next 12 months.

13. List the new permits that were applied for and granted in the past 12 months.

14. What, if any, are the local ordinances restricting hazardous air emissions that are not covered by state or country regulations?

15. What periodic audits does the site conduct of the air pollution control equipment?

16. What records are kept by the site of the local, state, and country regulatory contacts?

    How are phone calls and written correspondence documented and filed?

17. If the site falls under any country/local toxic air pollutant control program, list its control requirements (for example: percentage of the occupational contaminant limit at property line, less than 1 ton a year of certain compounds, and so forth).

18. List air emission sources that are exempt from permit requirements.

19. What future plans, if any, does the site management have that would require new air permits?

20. How are emission excursions handled?

21. List any regulatory inspections at the site in the past 12 months.

22. Identify the document describing the site air pollution episode plan if one is required.

23. List any nuisance complaints (odor, smoke, and so forth), if any, the site has received from local residents or regulatory agencies.

24. What evidence exists that the site is or is not located in an area where ambient contaminant levels exceed country/local standards?

25. What is the maintenance schedule of the boilers? How are emissions monitored and recorded?

---

26. How does the site document visual smoke tests performed on emission stacks?

3.14 UNDERGROUND STORAGE TANKS

A. Underground Storage Tanks

1. Provide details on any underground tanks in service on site.

2. Provide details on any underground tanks out-of-service.

3. Provide records of underground tanks that include:
   a. Location
   b. Size
   c. Age
   d. Materials of construction
   e. Contents

4. What leak monitoring and detection devices have been installed?

5. How often is testing done on the integrity of underground tanks and piping?

6. What records of integrity tests are maintained?

7. What soil analysis has been done around underground tanks to detect leakage?

8. What agencies has the site notified regarding its underground storage tanks?

9. Which tanks, if any, are scheduled to be removed from the ground in this fiscal year?

3.15 POLYCHLORINATED BIPHENYLS (PCBS)

A. PCB Management

1. Are PCB or PCB-contaminated oils in use or stored in the site? Where?
   a. Transformers?

   b. Capacitors?

   c. Electromagnets?

   d. Hydraulic systems?

   e. Other?

2. When was all electrical equipment on site surveyed to identify PCB-containing equipment?

3. Where and how are records of PCB equipment maintained?

4. How is each PCB item labeled and storage area marked to indicate it contains PCBs?

5. What secondary containment is provided for PCB-containing equipment?

6. How frequently are PCB items inspected and tested? List the following information on a separate page.
   a. The location of each PCB item

   b. The date of last inspection and name of inspector

   c. Notification of any leaks

   d. Notation of any corrective action taken

7. How are inspections of PCB items documented?

8. What are the plans for disposing of existing PCB items?

9. What PCB items are in storage awaiting disposal?

10. How many PCB spills and releases to the environment have occurred in the past 12 months?

11. What records are maintained of PCB releases to air, water, and land?

12. If the site has disposed of PCB material in off-site locations, provide records which list the name of the owner or operator of the disposal or storage facility.

13. What is the estimated amount of PCB chemical substance or PCB mixtures in service or stored for disposal at the site?

    In service: _____ kg
    In storage for use: _____ kg
    In storage for disposal: _____ kg

14. Has an annual report ever been required or prepared?

15. When, during the past 12 months, was the facility inspected for PCBs by a regulatory agency?

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